

4/9/1985

RCRA INSPECTION OVERSIGHT FORM

FILE COPY

I. Handler: Chemical Processors Inc. - Pier 91EPA ID # WAD 000812917Check Either: Major Non-MajorHandler Activities: ✓ Generator
Transporter
✓ Treatment/Storage/Disposal FacilityAuthorized States: ✓ Yes NoII. State Inspector: Lawrence AshleyOrganization: WDOE - Northwest Regional OfficeTelephone: 885-1900III. Evaluator: Andrew BoydOrganization: EPA, Region 10 - RCRA Compliance SectionTelephone: 442-1254IV. Date of Inspection: 4/9/85 Time: (from) 9:00 a.m. (to) 5 p.m.

V. Inspection Evaluation

A) Pre-inspection Evaluation:

1) Did the inspector have a complete set of RCRA regulations with him? ✓ RCRA DW-

2) Did the inspector review the Part A application or effective permit before beginning the inspection?

3) Did the inspector have the appropriate personal safety equipment?

Yes

No

Remarks

Appeared toCan't sayhad a hard hat - All that was required

USEPA RCRA



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B) Owner/Operator Interview

- 1) Did the inspector present an identity document showing the authority to perform RCRA inspections?
- 2) Did the inspector advise the owner/operator operator of the purpose of the inspection and briefly describe the agenda?
- 3) Was the inspector helpful to the owner/operator by giving explanations and guidance?

Yes	No	Remarks
	<input checked="" type="checkbox"/>	State Does Not Issue insp. credentials
<input checked="" type="checkbox"/>		

C) Document Inspection

- 1) Did the inspector review all relevant documents.
- a) Part A application or permit
- b) Operator inspection log and schedule
- c) Personnel training record
- d) Operating record
- e) Contingency plan
- f) Waste analysis plan
- g) Closure and post-closure plan
- h) Financial instruments
- i) Liability document
- j) Manifests
- k) Ground-water monitoring reports
- l) Other

<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		Did look at some of the logs -
	<input checked="" type="checkbox"/>	Not done during insp. & copies were not obtained at that time
	<input checked="" type="checkbox"/>	"
	<input checked="" type="checkbox"/>	"
	<input checked="" type="checkbox"/>	"
	<input checked="" type="checkbox"/>	"
<input checked="" type="checkbox"/>		Copies were distributed
	<input checked="" type="checkbox"/>	not located at facility - submitted to HQ
	<input checked="" type="checkbox"/>	
		N/A

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	Yes	No	Remarks
2) Did the inspector copy relevant documents for later desktop review?		<input checked="" type="checkbox"/>	Not at the time of the inspection
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	<input checked="" type="checkbox"/>		Did appear to observe all required items at the facility I did not see what was recorded
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facilities?	<input checked="" type="checkbox"/>		Questions could have been more detailed and thorough
3) Did the inspector identify any activities that are regulated but not on the Part A or Permit?		<input checked="" type="checkbox"/>	
E) Knowledge of the regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?			Wasn't demonstrated
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?			Wasn't demonstrated
3) Was the inspector able to answer questions accurately?			
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?			N/A

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F) Completion of inspection forms

Yes

No

Remarks

Completes the
state checklist

- 1) Did the inspector fully complete the inspection forms?

- 2) Does the inspector's report accurately reflect your observations at the facility? Did the inspector find all apparent violations?

- 3) Did the inspector miss any Class I violations?

Need to review
facility
plans

G) Remarks

- 1) What is your overall assessment of the inspection and the inspection report?

Poor - particularly as regards review of facility plans and documents.

- 2) What, if anything, would you recommend that the inspector do differently? Does this inspector need any additional training?

Review facility plans & documents in detail. Inspector needs extensive training on inspection procedures - he seems to be at a loss as to how to conduct the inspection, avoiding detail and looking only to conduct a general tour of the facility.

- 3) Additional remarks from other sections:

A. Boyo

7/26/85

Dennis Stefani, Manager of Regulatory Affairs

Chen Pro Inc.

RE:

Spill Prevention & Containment Plan
for Pier 91 facility

A.B.

indicates that at the inspection conducted
some months ago at Pier 91, thought I had
obtained a copy of the spill prevention &
containment plan - but apparently didn't -

Do have a copy of the contingency plan

Askes if he would send me a copy

D.S.

Askes to do so